

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

DONALD FOUST,)	
Individually and on behalf of all)	
others similarly situated,)	
)	
Plaintiff,)	Civil Action No. CIV-16-1447-R
)	
v.)	
)	
CPI SECURITY SERVICES, INC.,)	
COMPLETE PROTECTION &)	
INVESTIGATIONS, INC.,)	
LAWRENCE E. SANDERS and)	
CHRISTINE A. SANDERS,)	COLLECTIVE ACTION
)	PURSUANT TO 29 U.S.C. § 216(b)
Defendants.)	

**ANSWER OF DEFENDANTS CPI SECURITY SERVICES, INC. AND LAWRENCE E.
SANDERS TO PLAINTIFF'S FIRST AMENDED COLLECTIVE ACTION
COMPLAINT**

COMES NOW Defendants, CPI Security Services Inc., and Lawrence Sanders, and for their answer to Plaintiff's First Amended Collective Action Complaint ("First Amended Complaint"), state as follows:

- 1.1 The allegations contained in paragraph 1.1 of Plaintiff's Complaint do not require a response.
- 1.2 Defendants admit that Plaintiffs filed a consent form to join this lawsuit, but deny that all Plaintiffs worked for these Defendants.
- 1.3 Defendants deny the allegations contained in paragraph 1.3 of Plaintiff's First Amended Complaint.

1.4 Defendants deny the allegations contained in paragraph 1.4 of Plaintiff's First Amended Complaint.

1.5 Defendants deny the allegations contained in paragraph 1.5 of Plaintiff's First Amended Complaint.

1.6 Defendants deny the allegations contained in paragraph 1.6 of Plaintiff's First Amended Complaint.

1.7 Defendants deny the allegations contained in paragraph 1.7 of Plaintiff's First Amended Complaint.

1.8 Defendants deny the allegations contained in paragraph 1.8 of Plaintiff's First Amended Complaint.

1.9 Defendants are without sufficient information or knowledge to either admit or deny the allegations contained in paragraph 1.9 of Plaintiff's First Amended Complaint and therefore same are denied.

1.10 Defendants admit the allegations contained in paragraph 1.10 of Plaintiff's First Amended Complaint as to what Plaintiffs "seek", but deny they are entitled to recover.

2.1 Defendants admit Foust worked for the Defendants in this judicial district within the last three (3) years but deny the remaining allegations contained in paragraph 2.1 of Plaintiff's First Amended Complaint.

2.2 Defendants admit the Opt-In Plaintiff filed a consent form to join this lawsuit, but deny the remaining allegations contained in paragraph 2.2 of Plaintiff's First Amended Complaint.

2.3 Defendants admit the allegations contained in paragraph 2.3 of Plaintiff's First Amended Complaint.

2.4 Defendants admit the allegations contained in paragraph 2.4 of Plaintiff's First Amended Complaint.

2.5 Defendants deny they employed or "jointly employed" all Plaintiffs, but admit the jurisdictional allegations contained in paragraph 2.5 of Plaintiff's First Amended Complaint.

2.6 Defendants deny they employed or "jointly employed" all Plaintiffs, but admit the jurisdictional allegations.

2.6 Defendants deny the allegations contained in paragraph 2.6 of Plaintiff's First Amended Complaint.

3.1 Defendants admit the allegations contained in paragraph 3.1 of Plaintiff's First Amended Complaint.

3.2 Defendants admit the allegations contained in paragraph 3.2 of Plaintiff's First Amended Complaint.

3.3 Defendants admit the allegations contained in paragraph 3.3 of Plaintiff's First Amended Complaint.

3.4 Defendants admit the allegations contained in paragraph 3.4 of Plaintiff's First Amended Complaint.

3.5 Defendants admit the allegations contained in paragraph 3.5 of Plaintiff's First Amended Complaint.

4.1 Defendants deny the allegations contained in paragraph 4.1 of Plaintiff's First Amended Complaint.

4.2 Defendants deny the allegations contained in paragraph 4.2 of Plaintiff's First Amended Complaint.

4.3 Defendants deny the allegations contained in paragraph 4.3 of Plaintiff's First Amended Complaint.

4.4 Defendants deny the allegations contained in paragraph 4.4 of Plaintiff's First Amended Complaint.

4.5 Defendants deny the allegations contained in paragraph 4.5 of Plaintiff's First Amended Complaint.

4.6 Defendants are without sufficient information or knowledge to either admit or deny the allegations contained in paragraph 4.6 of Plaintiff's First Amended Complaint and therefore same are denied.

4.7 Defendants are without sufficient information or knowledge to either admit or deny the allegations contained in paragraph 4.7 of Plaintiff's First Amended Complaint and therefore same are denied.

4.8 Defendants admit the allegations contained in paragraph 4.8 of Plaintiff's First Amended Complaint, but deny that a collective action is necessary or appropriate.

5.1 Defendants admit the allegations contained in paragraph 5.1 of Plaintiff's First Amended Complaint.

5.2 Defendants admit the allegations contained in paragraph 5.2 of Plaintiff's First Amended Complaint.

5.3 Defendants deny the allegations contained in paragraph 5.3 of Plaintiff's First Amended Complaint.

5.4 Defendants admit the allegations contained in paragraph 5.4 of Plaintiff's First Amended Complaint.

5.5 Defendants admit the allegations contained in paragraph 5.5 of Plaintiff's First Amended Complaint.

5.6 Defendants deny the allegations contained in paragraph 5.6 of Plaintiff's First Amended Complaint.

5.7 Defendants deny the allegations contained in paragraph 5.7 of Plaintiff's First Amended Complaint.

5.8 Defendants deny the allegations contained in paragraph 5.8 of Plaintiff's Complaint.

5.9 Defendants deny the allegations contained in paragraph 5.9 of Plaintiff's First Amended Complaint.

5.10 Defendants deny the allegations contained in paragraph 5.10 of Plaintiff's First Amended Complaint.

5.11 Defendants deny the allegations contained in paragraph 5.11 of Plaintiff's First Amended Complaint.

5.12 Defendants deny the allegations contained in paragraph 5.12 of Plaintiff's First Amended Complaint.

5.13 Defendants deny the allegations contained in paragraph 5.13 of Plaintiff's First Amended Complaint.

5.14 Defendants deny the allegations contained in paragraph 5.14 of Plaintiff's First Amended Complaint.

5.15 Defendants deny the allegations contained in paragraph 5.15 of Plaintiff's First Amended Complaint.

5.16 Defendants admit they made personnel and payroll decisions with respect to Plaintiffs but deny the remaining allegations contained in paragraph 5.16 of Plaintiff's First Amended Complaint.

5.17 Defendants deny the allegations contained in paragraph 5.17 of Plaintiff's First Amended Complaint.

5.18 Defendants deny the allegations contained in paragraph 5.18 of Plaintiff's First Amended Complaint.

5.19 Defendants are without sufficient information or knowledge to either admit or deny the allegations contained in paragraph 5.18 of Plaintiff's First Amended Complaint and therefore same are denied.

5.20 Defendants deny the allegations contained in paragraph 5.20 of Plaintiff's First Amended Complaint.

5.21 Defendants deny the allegations contained in paragraph 5.21 of Plaintiff's First Amended Complaint.

5.22 Defendants deny the allegations contained in paragraph 5.22 of Plaintiff's First Amended Complaint.

5.23 Defendants deny the allegations contained in paragraph 5.23 of Plaintiff's First Amended Complaint.

5.24 Defendants admit the allegations contained in paragraph 5.24 of Plaintiff's First Amended Complaint.

5.25 Defendants deny the allegations contained in paragraph 5.25 of Plaintiff's Complaint.

5.26 Defendants deny the allegations contained in paragraph 5.26 of Plaintiff's First Amended Complaint.

5.27 Defendants deny the allegations contained in paragraph 5.26 of Plaintiff's First Amended Complaint.

6.1 Defendants deny the allegations contained in paragraph 6.1 of Plaintiff's First Amended Complaint.

6.2 Defendants deny the allegations contained in paragraph 6.2 of Plaintiff's First Amended Complaint

6.3 Defendants deny the allegations contained in paragraph 6.3 of Plaintiff's First Amended Complaint.

6.4 Defendants deny the allegations contained in paragraph 6.4 of Plaintiff's First Amended Complaint.

6.5 Defendants deny the allegations contained in paragraph 6.5 of Plaintiff's First Amended Complaint.

6.6 Defendants deny the allegations contained in paragraph 6.6 of Plaintiff's First Amended Complaint.

6.7 Defendants deny the allegations contained in paragraph 6.7 of Plaintiff's First Amended Complaint.

6.8 Defendants deny the allegations contained in paragraph 6.8 of Plaintiff's First Amended Complaint.

6.9 Defendants deny the allegations contained in paragraph 6.9 of Plaintiff's First Amended Complaint.

6.10 Defendants admit the allegations contained in paragraph 6.10 of Plaintiff's First Amended Complaint, but deny that a collective action is necessary or appropriate.

6.11 Defendants deny the allegations contained in paragraph 6.11 of Plaintiff's First Amended Complaint.

6.12 Defendants deny the allegations contained in paragraph 6.12 of Plaintiff's First Amended Complaint.

6.13 Defendants deny the allegations contained in paragraph 6.13 of Plaintiff's First Amended Complaint.

6.14 Defendants deny the allegations contained in paragraph 6.14 of Plaintiff's First Amended Complaint.

6.15 Defendants deny the allegations contained in paragraph 6.15 of Plaintiff's First Amended Complaint.

6.16 Defendants deny the allegations contained in paragraph 6.16 of Plaintiff's First Amended Complaint.

6.17 Defendants deny the allegations contained in paragraph 6.17 of Plaintiff's First Amended Complaint.

7.1 Defendants deny the allegations contained in paragraph 7.1 of Plaintiff's First Amended Complaint.

7.2 Defendants deny the allegations contained in paragraph 7.2 of Plaintiff's First Amended Complaint.

8.1 Defendants admit the allegation contained in paragraph 8.1 of Plaintiff's First Amended Complaint as to what Plaintiff's "pray for," but deny they are entitled to judgment, award, or recovery.

AFFIRMATIVE DEFENSES

1. Payment.
2. Waiver.
3. Plaintiffs are not similarly situated and/or properly joined.
4. Failure to state a claim upon which relief may be granted.
5. Discovery is still ongoing, Defendants reserve their right to amend this Answer as discovery progresses.

WHEREFORE, having fully answered, Defendants CPI and Lawrence E. Sanders pray that Plaintiff take nothing by way of his First Amended Complaint and that Defendants recover their costs and such other and further relief as the Court deems just and proper.

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CERTIFICATE OF SERVICE

:I hereby certify that on November 13, 2017, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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